

May 23, 2005

Docket No. 05-015-1
Regulatory Analysis & Development, PPD
APHIS Station 3C71
4700 River Road Unit 118
Riverdale, MD 20737-1238

Comments on the Draft Strategic Plan for the National Animal Identification System (NAIS) as follows:

1. Is a mandatory ID program necessary to achieve a successful animal disease—? Yes. Reasons. Many livestock producers will not comply with a voluntary program because of the extra expense and time it will take to complete registration. This is especially true where livestock brokers buy and sell cattle on a daily basis. Many of these brokers conduct their business on a cash basis and they are afraid some type of tracking system will enable the IRS to know they are cheating on their income tax.

2. At what point and how should compliance be ensured? Producers should report any transfers of livestock to and from their farm. This information could come from data at sale barns or be provided to the agency responsible for tracking the information. USDA's Farm Service Agency has a secure data base of farms in each county in the US. FSA would be a logical place to report such information.

3. The Draft Program Standards document contains an option for tagging sites where AIN tags could be applied. Is this a viable option? No. Tagging sites will add costs to the program. Most farmers have holding chutes for working their cattle and are used to tagging, vaccinating and putting farm record tags on their cattle. Again the Farm Service Agency could issue ID tags using the proposed numbering system. FSA personnel and/or State Agriculture personnel could then conduct a farm visit to make sure all cattle were tagged properly.

4. In what manner should compliance with ID and movement reporting requirements be achieved when the sale is between a buyer and seller? FSA office staffs are members of the community and have developed a good working relationship with local producers. If FSA has the responsibility for keeping the data base in their records, livestock producers will be more at ease, dealing with local people. County FSA offices have always been able complete their assigned tasks. If it becomes their responsibility to maintain an animal ID data base they will undoubtedly be able to do so.

5. USDA suggests that animals should be identified anytime prior to entering commerce or being commingled with animals from other premises. Is this recommendation adequate to achieve timely trace-back capabilities to support animal health programs or should a timeframe (age limit) for identifying the animals be considered? For the program to be

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effective, animals should be identified as early as possible. Otherwise, animals that are born on one farm or location, could develop a disease, such as BSE, and be destroyed and never reported to local authorities.

6. Are the timelines for implementing the NAIS, as discussed in the Draft Strategic Plan realistic, too aggressive, or not aggressive enough to allow the NAIS to be implemented in a timely manner? The timeline of requiring defined animal movements required by January 2009 is realistic. It is going to take time for local, State and Federal agencies to come up with a reliable system that will be effective to implement an ID system. Producers will then need sufficient time to learn the requirements.

7. Should requirements for all species be implemented within the same timelines, or should flexibility be allowed? Priority should be given to cattle ID, first, because of the incidence of BSE.

8. What are the most cost-effective and efficient ways for submitting information to the database? The Farm Service Agency (FSA) already has a secure internet database in place. Software could be created which would allow FSA personnel to enter the data received by mail, by e-mail, or by person at local FSA offices. A system of collecting data at slaughterhouses could be implemented and this data could then be delivered by mail or local FSA personnel could pick it up. FSA offers a cost-effective way to not only keep track of the data as it becomes available, but its internet connection would be a secure place for the data and the data would then be available to other government agencies.

9. What specific information should be protected from disclosure and why? Producer's name and address and any information that shows a pattern of a producer's operation. This pattern could be size of his operation, location of livestock, and the frequency of buying and selling livestock. Only information such as total numbers of livestock in a county or state and/or numbers of diseased animals in a state or county should be made available to the public.

10. Should both the seller and buyer of a specific group of animals report the movement of the animals or is reporting by one party adequate? In most cases reporting by the seller would be sufficient, except when the buyer becomes the seller as in the case of where a cattle broker buys and sells animals in a short time period.

Questions concerning who should manage the database?

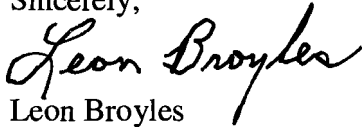
USDA's Farm Service Agency (FSA) would be the logical place to manage the database for the following reasons:

- FSA has the capability to provide this service with little additional cost.
- FSA has local offices in nearly all counties in the U.S.

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- FSA has a proven record of implementing livestock programs quickly and accurately.
- Many of our nation's livestock producers are already in FSA's database.
- Many FSA offices have GIS/GPS capabilities already in place and the rest will have it available soon.

Sincerely,

A handwritten signature in cursive script that reads "Leon Broyles".

Leon Broyles
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Englewood, TN 37329